

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DARRICK GRIMES and YOLANDA GRIMES, on behalf  
of themselves and a class of others similarly situated,

Plaintiffs, Pro Se

-against-

Case No. 1024-CV-08  
(KMK)

FREMONT GENERAL CORPORATION, FREMONT  
INVESTMENT & LOAN, WCS LENDING LLC,  
JONATHAN TANENBAUM, NADENE McBEAN, U.S.  
BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR  
MASTER ASSET BACKED SECURITIES TRUST 2006-  
FRE-1, "JOHN DOE" and "JANE DOE," the last two  
names being fictitious said parties being individuals, if  
any, having any involvement in the fraud perpetrated on  
plaintiffs, and XYZ-1 Corporation and XYZ-2  
Corporation, the last two names being fictitious, it being  
the intentions of the plaintiffs to designate any  
corporation or entity having any Involvement in the  
fraud perpetrated on plaintiffs described herein,

**NOTICE OF MOTION TO DISMISS  
SECOND AMENDED COMPLAINT**

Defendants.


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**PLEASE TAKE NOTICE THAT**, upon the Declaration of Kenneth J. Flickinger,  
dated May 2, 2012, and the exhibits annexed thereto, and the Memorandum of Law in  
support; and all of the prior papers and proceedings therein, Defendant Signature  
Group Holdings, Inc., f/k/a Fremont Reorganizing Corporation, f/k/a Fremont  
Investment & Loan and Fremont General Corporation ("Fremont") will move this  
Court, at a date and time to be determined, before the Honorable Kenneth M. Karas,  
United States District Judge, Southern District of New York, at the White Plains  
Courthouse, located at 300 Quarropas Street, White Plains, New York 10601, for (1) an  
order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing the second

amended complaint in its entirety, and (2) granting such other and further relief as this Court deems just and proper.

Dated: Elmsford, New York  
May 2, 2012

**KNUCKLES, KOMOSINSKI & ELLIOTT, LLP**

By:   
KENNETH J. FLICKINGER, ESQ. (KJ-1179)  
Attorneys for Defendants  
Signature Group Holdings, Inc., f/k/a  
Fremont Reorganizing Corporation, f/k/a  
Fremont Investment & Loan, and Fremont  
General Corporation  
565 Taxter Road, Suite 590  
Elmsford, NY 10523  
Telephone: (914) 345-3020  
Facsimile: (914) 366-0080  
[kjf@kkelaw.com](mailto:kjf@kkelaw.com)

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565 Taxter Road, Suite 590  
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[kjf@kkelaw.com](mailto:kjf@kkelaw.com)

### CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on May 2, 2012, a true and correct copy of the foregoing Notice of Motion to Dismiss Second Amended Complaint, Declaration in Support and Memorandum of Law with Exhibits was served on the parties listed below by overnight mail.

Darrick and Yolanda Grimes  
23 Stracy Lee Drive  
Newburgh, NY 12550

Matthew J. Bizzaro  
L'Abbate, Balkan, Colavita & Contini  
Attorneys for Defendant  
WCS Lending, LLC  
1050 Franklin Avenue  
Garden City, NY 11530

  
(KENNETH J. FLICKINGER, ESQ. (KJ-1179)  
ATTORNEYS FOR DEFENDANTS  
SIGNATURE GROUP HOLDINGS, INC.,  
F/K/A FREMONT REORGANIZING  
CORPORATION, F/K/A FREMONT  
INVESTMENT & LOAN, AND FREMONT  
GENERAL CORPORATION  
565 TAXTER ROAD, SUITE 590  
ELMSFORD, NY 10523  
TELEPHONE: (914) 345-3020  
FACSIMILE: (914) 366-0080  
[kjf@kkelaw.com](mailto:kjf@kkelaw.com)